

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ELVIN MERCADO)	
)	
v.)	CIVIL NO. 04-11653-PBS
)	
UNITED STATES OF AMERICA)	
)	

GOVERNMENT'S MOTION TO CONTINUE RESPONSE DATE

The United States of America hereby moves that the time for the government to file a response to the Petition in this case be extended for 60 days. As grounds therefore, the undersigned states that he will be out of this office for the next two weeks and is scheduled to start a trial in United States v. Reyes Santana, Cr. 04-10032-GAO upon his return and that the additional time is therefore needed in order to frame a response to the various arguments advanced.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s John A. Wortmann, Jr.
JOHN A. WORTMANN, JR.
Assistant U.S. Attorney
(617) 748-3207

CERTIFICATE OF SERVICE

I, JOHN A WORTMANN, JR., Assistant U.S. Attorney, do hereby certify that I have this 13th day of August, 2004, served the copy of the foregoing by mail to Elvin Mercado, pro se, No. 2448-038, FMC Devens, PO Box 879, Ayer, MA 01432.

/s John A. Wortmann, Jr.
JOHN A. WORTMANN, JR.
Assistant U.S. Attorney